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December 10, 2021

**VIA ECF**

Honorable Taryn A. Merkl  
United States Magistrate Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Bartlett v. Société Générale de Banque au Liban S.A.L.*, Case No. 19-cv-0007**

Dear Magistrate Judge Merkl:

The parties write jointly in advance of Monday's scheduled telephonic status conference to briefly update the Court. The parties held their initial Rule 26(f) conference on November 5, 2021, and we have met and conferred on two subsequent occasions, including on December 8. The parties' respective scheduling proposals are set forth below.

Defendants (except for JTB) have proposed the following schedule:

Last day for Plaintiffs to issue subpoenas to Defendants' correspondent banks	January 10, 2022
Parties serve initial RFPs	January 17, 2022
Parties serve objections and responses to initial RFPs	March 18, 2022
Parties complete meet and confer process over objections to initial RFPs	April 18, 2022
Parties file motions to compel or for protective order as to unresolved objections to initial RFPs, including as to bank secrecy	May 2, 2022
Oppositions to discovery motions on initial RFPs	June 2, 2022
Replies on discovery motions on initial RFPs	June 23, 2022
Defendants submit Letters Rogatory or Requests for Judicial Assistance as to initial RFPs, if necessary following rulings on discovery motions including foreign bank secrecy	30 days after District Court ruling on objections raised by discovery motions including bank secrecy

Letter to Honorable Taryn A. Merkl, U.S.M.J.

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Parties to report to Court concerning status of Letters Rogatory or Requests for Judicial Assistance	90 days after issuance of Letters Rogatory or Requests for Judicial Assistance
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Plaintiffs have proposed the following schedule:

Parties serve Initial RFPs	December 20, 2021
Parties serve objections to Initial RFPs	February 23, 2022
Parties file motions to compel or for protective orders as to unresolved objections to Initial RFPs, including as to bank secrecy	March 23, 2022
Deadline to file opposition briefs to motions to compel	April 25, 2022
Deadline to file reply briefs to motions to compel	May 16, 2022
Deadline to submit Requests for Judicial Assistance if foreign bank secrecy objections are overruled and motion to compel is granted (in whole or in part). This is without waiver to Defendants' rights to seek additional time and Plaintiffs' rights to object to that request	10 <u>business</u> days following Court determination on motion to compel
Deadline for Defendants to notify the Court as to whether they will produce records ordered by the Court (if any). This is without waiver to Defendants' rights to seek additional time from the Court if warranted by delays in response from Lebanese authorities and Plaintiffs' rights to object to that request	90 days from the Issuance of any Letters Rogatory or other Requests for Judicial Assistance

The parties will be prepared to present their views of the merits of their respective proposals during the status conference but given the number of data points – including alternative dates – involved, we thought the Court would benefit from having the proposed schedules in hand.

Respectfully submitted,

/s/ Gary M. Osen

cc: All counsel (via ECF)